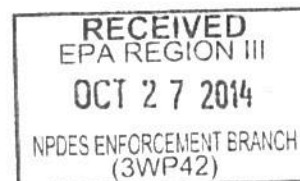




**Federal Express 8047 4954 2270**



October 23, 2014

Ms. Ingrid H. Hopkins  
Water Protection Division (3WP42)  
US EPA – Region III  
1650 Arch Street  
Philadelphia, PA 19103-3029  
(215) 814-5437  
[hopkins.ingrid@epa.gov](mailto:hopkins.ingrid@epa.gov)

**RE: Benning Road Generating Station – NPDES Permit No. DC 0000094  
pH Excursion– Outfall 101**

Dear Ms. Hopkins,

This letter is a follow-up to the October 21, 2014 telephone notification, made on behalf of Pepco Energy Services, Inc. by Ms. Heather Brinkerhoff of HB Consulting, to report a pH exceedance from a storm water composite sample taken on October 21, 2014 from Outfall 101/Manhole K.

The pH readings taken in the field from the composite sample at Outfall 101/Manhole K during the storm water sampling event on October 21<sup>st</sup> indicated that the pH value exceed the permit limit, as follows:

Analyte	Units	Permit Limit Daily Max	Results
pH	SU	6-8.5	8.63

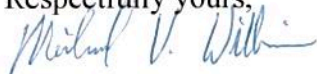
Ms. Brinkerhoff made the required telephone notification to the USEPA per NPDES permit condition VI.6. We have been unable to identify the specific cause of this pH exceedance. However, it is suspected that one possible source of elevated pH may be calcium hydroxide (free lime) from concrete in the vicinity of Outfall 101/Manhole K that has been disturbed as part of the ongoing power plant demolition activities. We have installed and maintained the appropriate controls to minimize impacts to storm water from demolition activities. In particular, within the demolition areas, we have utilized custom fitted inlet filters either above or below grade depending on application, and then a layer of porous filter fabric is used to cover the grating. A 3" layer of virgin course aggregate (#57 stone) which helps sieve sediment is applied atop the filter fabric and then the entire drain is surrounded by metal absorbing booms. A re-test composite sample from Outfall 101 will be taken for pH during the next qualifying storm to assess whether elevated pH conditions are persisting. We will report the results of this re-sampling event to EPA.

1300 North 17<sup>th</sup> Street • Suite 1500 • Arlington • VA • 22209 • 703-253-1800 • Fax 703-253-1799 • [www.pepcoenergy.com](http://www.pepcoenergy.com)

*Pepco Energy Services, Inc. is not the same company as Potomac Electric Power Company (Pepco), the regulated utility, and prices and services of Pepco Energy Services, Inc. are not set by the Public Service Commission.*

Please contact me at (703) 253-1787 or by electronic mail at [mwilliams@pepcoenergy.com](mailto:mwilliams@pepcoenergy.com) if you need additional information.

Respectfully yours,



**Michael V. Williams**  
**Power Plant Asset Manager**  
**Pepco Energy Services, Inc.**

**Cc: File**